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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO AND PORTIONS OF
MOTION TO EXCLUDE ONE OF THREE
OPINIONS PROFFERED BY WAYMO
EXPERT JIM TIMMINS**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the District of Columbia. I make this declaration in support of Uber’s Administrative Motion to File Under Seal Exhibits to and Portions of Uber’s Motion to Exclude One of Three Opinions Proffered by Waymo Expert Jim Timmins (“Motion to Exclude”). I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following exhibits and only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Exclude	Yellow – highlighted portions	Sandstone Group and Tyto LiDAR
Exhibit 1	Entire Document	Waymo, Sandstone Group LLC, and Tyto LiDAR LLC

3. Waymo designated the entirety of Exhibit 1 as “Highly Confidential – Attorney’s Eyes Only,” in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case. *See* 3/16 H’rg Tr. at 6. Uber files this material under seal in accordance with Paragraph 14.4 of the Protective Order.

4. Exhibit 1 also contains information that has been designated as confidential by non-parties Sandstone Group, LLC, and Tyto LiDAR, LLC, including confidential information regarding the ownership and structure of Sandstone Group, financing of Sandstone Group, the ownership of Tyto LiDAR, and the financing of Tyto LiDAR.

5. The redacted portions of the Motion to Exclude contain information discussing Exhibit 1 and their sealing is justified for the same reasons.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is true
2 and correct. Executed this 16th day of September, 2017, in Washington, DC.

3
4 /s/ Martha L. Goodman

Martha L. Goodman

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7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
9 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has
10 concurred in this filing.

11
12 /s/ Karen L. Dunn

Karen L. Dunn